

ORIGINAL



STATE UNIVERSITY OF NEW YORK
TELECOMMUNICATIONS OFFICERS ASSOCIATION

February 10, 2000

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
Room TW-A324
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the Commercial
Mobile Radio Services

Dear Ms. Salas:

I am Bill Gruszka, Director of Telecommunications at Oswego State University of New York. This year I am also serving as Chair of the Telecommunications Officer's Association (TOA) for the State University of New York (SUNY) System. TOA represents the 64 SUNY campuses, which include 71,000 faculty and staff and over 360,000 students. We all have unique Telecommunications needs but all share the problem of recharging calls made by users of our telephone systems.

As a members of ACUTA: the Association of Telecommunications Professionals in Higher Education, the campuses of the SUNY System have closely followed the Calling Party Pays ("CPP") rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are non-profit educational institutions deeply concerned that without appropriate safeguards, CPP will expose our campuses to significant financial liability that would undermine our ongoing effort to provide educational services. With extensive telecommunications infrastructures accessible to such large numbers of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions in campus buildings that are routed through centralized PBXs (or CENTREXs) controlled by the telecommunications departments. Our existing PBXs can easily be programmed to block, or track call detail for, a variety of calls, such as toll ("1+") calls (which will bill for) and calls to pay-per-call services (i.e., calls to "900" numbers, which we block), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX requests an authorization code before completing the call. This process enables our telecommunications department to bill the individual caller for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of billing as toll calls scheme (i.e. different rate plans, roaming charges etc.) we will not be able to accurately rebill the calling party at the time the call is placed. Given the transient nature of our students (a

normal 25% turnover annually) the caller may not be part of our system by the time the bill is received on campus. This is especially true for calls placed near the end of the semester.

We agree that verbal notification to calling parties is a critical prerequisite to the implementation of CPP in a way that protects consumers. But this kind of notification by itself would not protect our institution from unauthorized CPP calls. A student or employee can hear the notification, but the institution will never be able to bill that student or employee for his/her charges. Without some means to screen and block calls, it will take very little time for our campus population to learn that "free" calls can be made to CPP numbers, the cost of which will ultimately be borne by Oswego State. Even a small percentage of calls made to CPP numbers would have a direct and immediate impact on our already constrained budget.

We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentations in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes ("SACs") to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the designated CPP SAC(s) in exactly the same way that they are programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest -- and accommodate the needs of educational institutions such as ours -- by assigning a unique SAC to all CPP numbers. We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



William Gruszka

Chair, Telecommunications Officer's Association for SUNY